



POTENTIAL HAZARDOUS WASTE SITE
IDENTIFICATION AND PRELIMINARY ASSESSMENT

REGION SITE NUMBER (to be assigned by HQ)

TX05614

NOTE: This form is completed for each potential hazardous waste site to help set priorities for site inspection. The information submitted on this form is based on available records and may be updated on subsequent forms as a result of additional inquiries and on-site inspections.

GENERAL INSTRUCTIONS: Complete Sections I and III through X as completely as possible before Section II (Preliminary Assessment). File this form in the Regional Hazardous Waste Log File and submit a copy to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force (EN-335); 401 M St., SW; Washington, DC 20460.

I. SITE IDENTIFICATION

A. SITE NAME Phelps Dodge Copper Company		B. STREET (or other identifier) P.O. Box 20200 (Hawkins Blvd.)	
C. CITY El Paso	D. STATE Texas	E. ZIP CODE 79998	F. COUNTY NAME El Paso
G. OWNER/OPERATOR (if known) 1. NAME Phelps Dodge Copper Company		2. TELEPHONE NUMBER 915/778-9371	
H. TYPE OF OWNERSHIP <input type="checkbox"/> 1. FEDERAL <input type="checkbox"/> 2. STATE <input type="checkbox"/> 3. COUNTY <input type="checkbox"/> 4. MUNICIPAL <input checked="" type="checkbox"/> 5. PRIVATE <input type="checkbox"/> 6. UNKNOWN			
I. SITE DESCRIPTION Unlined earthen lagoon containing spent acid, copper, rolling mill cooling water, wax solution, hydraulic oil and lube oil.			
J. HOW IDENTIFIED (i.e., citizen's complaints, OSHA citations, etc.) Texas Department of Water Resources compliance survey			K. DATE IDENTIFIED (mo., day, & yr.) 6-14-79
L. PRINCIPAL STATE CONTACT 1. NAME Robert L. Bradshaw		2. TELEPHONE NUMBER 915/445-3615	

II. PRELIMINARY ASSESSMENT (complete this section last)

A. APPARENT SERIOUSNESS OF PROBLEM <input type="checkbox"/> 1. HIGH <input type="checkbox"/> 2. MEDIUM <input checked="" type="checkbox"/> 3. LOW <input type="checkbox"/> 4. NONE <input type="checkbox"/> 5. UNKNOWN TXD048924989 PHELPS DODGE COPPER PROD CO		
B. RECOMMENDATION <input type="checkbox"/> 1. NO ACTION NEEDED (no hazard) <input type="checkbox"/> 2. IMMEDIATE SITE INSPECTION NEEDED a. TENTATIVELY SCHEDULED FOR: b. WILL BE PERFORMED BY: <input checked="" type="checkbox"/> 3. SITE INSPECTION NEEDED a. TENTATIVELY SCHEDULED FOR: b. WILL BE PERFORMED BY: <input checked="" type="checkbox"/> 4. SITE INSPECTION NEEDED (low priority)		
C. PREPARER INFORMATION 1. NAME Robert L. Bradshaw 2. TELEPHONE NUMBER 915/445-3615 3. DATE (mo., day, & yr.) 6-10-80		

III. SITE INFORMATION

A. SITE STATUS <input checked="" type="checkbox"/> 1. ACTIVE (Those industrial or municipal sites which are being used for waste treatment, storage, or disposal on a continuing basis, even if infrequently.) <input type="checkbox"/> 2. INACTIVE (Those sites which no longer receive wastes.) <input type="checkbox"/> 3. OTHER (specify):	
B. IS GENERATOR ON SITE? <input type="checkbox"/> 1. NO <input checked="" type="checkbox"/> 2. YES (specify generator's four-digit SIC Code): 3351	
C. AREA OF SITE (in acres) Plant site \approx 25 acres Lagoon \approx 0.5 acre	D. IF APPARENT SERIOUSNESS OF SITE IS HIGH, SPECIFY COORDINATES 1. LATITUDE (deg., min., sec.) 2. LONGITUDE (deg., min., sec.)
E. ARE THERE BUILDINGS ON THE SITE? <input type="checkbox"/> 1. NO <input checked="" type="checkbox"/> 2. YES (specify): Office, copper casting building, rod mill building.	

CHARACTERIZATION OF SITE ACTIVITY

Indicate the major site activity(ies) and details relating to each activity by marking 'X' in the appropriate boxes.

A. TRANSPORTER		B. STORER		C. TREATER		D. DISPOSER	
<input checked="" type="checkbox"/> 1. RAIL		<input type="checkbox"/> 1. PILE		<input type="checkbox"/> 1. FILTRATION		<input type="checkbox"/> 1. LANDFILL	
<input type="checkbox"/> 2. SHIP		<input type="checkbox"/> 2. SURFACE IMPOUNDMENT		<input type="checkbox"/> 2. INCINERATION		<input type="checkbox"/> 2. LANDFARM	
<input type="checkbox"/> 3. BARGE		<input type="checkbox"/> 3. DRUMS		<input type="checkbox"/> 3. VOLUME REDUCTION		<input type="checkbox"/> 3. OPEN DUMP	
<input type="checkbox"/> 4. TRUCK		<input type="checkbox"/> 4. TANK, ABOVE GROUND		<input type="checkbox"/> 4. RECYCLING/RECOVERY	<input checked="" type="checkbox"/>	<input type="checkbox"/> 4. SURFACE IMPOUNDMENT	
<input checked="" type="checkbox"/> 5. PIPELINE		<input type="checkbox"/> 5. TANK, BELOW GROUND		<input type="checkbox"/> 5. CHEM./PHYS. TREATMENT		<input type="checkbox"/> 5. MIDNIGHT DUMPING	
<input type="checkbox"/> 6. OTHER (specify):		<input type="checkbox"/> 6. OTHER (specify):		<input type="checkbox"/> 6. BIOLOGICAL TREATMENT		<input type="checkbox"/> 6. INCINERATION	
				<input type="checkbox"/> 7. WASTE OIL REPROCESSING		<input type="checkbox"/> 7. UNDERGROUND INJECTION	
				<input type="checkbox"/> 8. SOLVENT RECOVERY		<input type="checkbox"/> 8. OTHER (specify):	
				<input checked="" type="checkbox"/> 9. OTHER (specify): None			

E. SPECIFY DETAILS OF SITE ACTIVITIES AS NEEDED

V. WASTE RELATED INFORMATION

A. WASTE TYPE

☐ 1 UNKNOWN ☒ 2. LIQUID ☐ 3. SOLID ☐ 4. SLUDGE ☐ 5. GAS

B. WASTE CHARACTERISTICS

☐ 1 UNKNOWN ☒ 2. CORROSIVE ☐ 3. IGNITABLE ☐ 4. RADIOACTIVE ☐ 5. HIGHLY VOLATILE
☐ 6. TOXIC ☒ 7. REACTIVE ☐ 8. INERT ☐ 9. FLAMMABLE

☒ 10. OTHER (specify): Heavy Metals (Copper)

C. WASTE CATEGORIES

1. Are records of wastes available? Specify items such as manifests, inventories, etc. below.

Provided by company from plant records.

2. Estimate the amount(specify unit of measure)of waste by category; mark 'X' to indicate which wastes are present.

a. SLUDGE	b. OIL	c. SOLVENTS	d. CHEMICALS	e. SOLIDS	f. OTHER
AMOUNT	AMOUNT 30	AMOUNT	AMOUNT 14,400	AMOUNT	AMOUNT 8640
UNIT OF MEASURE	UNIT OF MEASURE Gallons/Month	UNIT OF MEASURE	UNIT OF MEASURE Gallons/Day	UNIT OF MEASURE	UNIT OF MEASURE Gallons/Day
<input checked="" type="checkbox"/> (1) PAINT, PIGMENTS	<input checked="" type="checkbox"/> (1) OILY WASTES	<input checked="" type="checkbox"/> (1) HALOGENATED SOLVENTS	<input checked="" type="checkbox"/> (1) ACIDS	<input checked="" type="checkbox"/> (1) FLYASH	<input checked="" type="checkbox"/> (1) LABORATORY PHARMACEUT.
(2) METALS SLUDGES	(2) OTHER(specify):	(2) NON-HALOGNTD. SOLVENTS	(2) PICKLING LIQUORS	(2) ASBESTOS	(2) HOSPITAL
(3) POTW		(3) OTHER(specify):	(3) CAUSTICS	(3) MILLING/ MINE TAILINGS	(3) RADIOACTIVE
(4) ALUMINUM SLUDGE			(4) PESTICIDES	(4) FERROUS SMLTG. WASTES	(4) MUNICIPAL
(5) OTHER(specify):			(5) DYES/INKS	(5) NON-FERROUS SMLTG. WASTES	<input checked="" type="checkbox"/> (5) OTHER(specify): Copper rolling mill cooling water.
			(6) CYANIDE	(6) OTHER(specify):	
			(7) PHENOLS		
			(8) HALOGENS		
			(9) PCB		
			<input checked="" type="checkbox"/> (10) METALS		
			(11) OTHER(specify):		

V. WASTE RELATED INFORMATION (continued)

3. LIST SUBSTANCES OF GREATEST CONCERN WHICH MAY BE ON THE SITE (place in descending order of hazard).

Spent acid solution containing copper.

4. ADDITIONAL COMMENTS OR NARRATIVE DESCRIPTION OF SITUATION KNOWN OR REPORTED TO EXIST AT THE SITE.

Water balance on lagoon indicates seepage losses of 6.9 million gallons per year. General ground water conditions and geological information of the area are favorable for ground water contamination from continued operation

VI. HAZARD DESCRIPTION

A. TYPE OF HAZARD	B. POTENTIAL HAZARD (mark 'X')	C. ALLEGED INCIDENT (mark 'X')	D. DATE OF INCIDENT (mo., day, yr.)	E. REMARKS
1. NO HAZARD				
2. HUMAN HEALTH				
3. NON-WORKER INJURY/EXPOSURE				
4. WORKER INJURY				
5. CONTAMINATION OF WATER SUPPLY				
6. CONTAMINATION OF FOOD CHAIN				
7. CONTAMINATION OF GROUND WATER				
8. CONTAMINATION OF SURFACE WATER				
9. DAMAGE TO FLORA/FAUNA				
10. FISH KILL				
11. CONTAMINATION OF AIR				
12. NOTICEABLE ODORS				
13. CONTAMINATION OF SOIL				
14. PROPERTY DAMAGE				
15. FIRE OR EXPLOSION				
16. SPILLS/LEAKING CONTAINERS/ RUNOFF/STANDING LIQUIDS				
17. SEWER, STORM DRAIN PROBLEMS				
18. EROSION PROBLEMS				
19. INADEQUATE SECURITY				
20. INCOMPATIBLE WASTES				
21. MIDNIGHT DUMPING				
22. OTHER (specify): See Site Description page attached.	X			

VII. PERMIT INFORMATION

A. INDICATE ALL APPLICABLE PERMITS HELD BY THE SITE.

- ☐ 1. NPDES PERMIT ☐ 2. SPCC PLAN ☐ 3. STATE PERMIT (specify): Solid Waste Registration
☐ 4. AIR PERMITS ☐ 5. LOCAL PERMIT ☐ 6. RCRA TRANSPORTER No. 30825
☐ 7. RCRA STORER ☐ 8. RCRA TREATER ☐ 9. RCRA DISPOSER
☐ 10. OTHER (specify): _____

B. IN COMPLIANCE?

- ☐ 1. YES ☒ 2. NO ☐ 3. UNKNOWN

4. WITH RESPECT TO (list regulation name & number): TDWR Rule No. 156.22.01.006

VIII. PAST REGULATORY ACTIONS

- ☐ A. NONE ☒ B. YES (summarize below)

A letter was sent to permittee on December 20, 1979, requesting specific information within 60 days. No response to date (05-07-80).

IX. INSPECTION ACTIVITY (past or on-going)

- ☐ A. NONE ☒ B. YES (complete items 1, 2, 3, & 4 below)

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION (mo., day, & yr.)	3. PERFORMED BY (EPA/State)	4. DESCRIPTION
Compliance Survey	Aug. 1, '77	State	
Compliance Survey	May 5, '78	State	
Compliance Survey Follow-up	June 14, '79 Sept 25, '79	State	

X. REMEDIAL ACTIVITY (past or on-going)

- ☐ A. NONE ☐ B. YES (complete items 1, 2, 3, & 4 below)

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION (mo., day, & yr.)	3. PERFORMED BY (EPA/State)	4. DESCRIPTION

NOTE: Based on the information in Sections III through X, fill out the Preliminary Assessment (Section II) information on the first page of this form.

SITE DESCRIPTION

Make additional comments or narrative description of situation known or reported to exist at the site based on file review. Include dates and description of any incidents documented in file.

The Phelps Dodge Copper Products Company (correct name) located in El Paso generates wastes which include a spent acid solution containing copper from copper rod pickling, rolling mill cooling water from the processing copper and rolling unit and melting and casing unit, hydraulic and lube oil spillage, and a processing wax solution. All these are piped to an on-site, unlined, earthen lagoon at a total flow rate of 16 gpm, 24-hrs. per day, 365 days per year. The lagoon measures 200'X 100'X 4'. Based on Texas Water Development Board Report 64, the net reservoir evaporation rate for the El Paso area is 6.09 ft./yr. A water balance performed on the pond indicates seepage losses of 6.9 million gallons per year. In addition, general ground water conditions and geological information of the area are favorable for the ground water contamination from continued operation of the lagoon.